REMARKS

Claims 11-16, 32-37, and 40-45 are pending.

In an Official Action dated August 2, 2007, all claims were rejected under 35 U.S.C. § 103(a). Claims 11-14, 32-35, and 40-43 were rejected over U.S. Patent 6,067,565 (Horvitz) in view of U.S. Patent 5,822,759 (Treynor). Claims 15, 36, and 44 were rejected over Horvitz in view of Treynor and also in view of U.S. Patent 6,543,404 (Bereznyi). Claims 16-18, 37-39, were rejected over Horvitz in view of Treynor and also in view of U.S. Patent 6,085,216 (Huberman).

Interview Summary

Applicants thank the Examiner for a telephonic interview on November 26, 2007. At the interview, Examiner Avellino and the undersigned discussed differences between Applicants' disclosure and the references of record. In particular, pages 37-38 of Applicants' disclosure were discussed. Applicants' representative agreed to prepare this written amendment incorporating the disclosed "maximum navigation probability" into the independent claims.

Rejection of Independent Claims 11, 32, and 40 Under 35 U.S.C. § 103(a)

Independent claims 11, 32, and 40 were rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over Horvitz in view of Treynor. While Applicants disagree with the basis for the rejections, these claims are nonetheless amended to expedite prosecution. In particular, claim 32 is amended to recite:

> a component configured to compute a navigation probability data field for a cacheline in which said content element is to be stored, where said computing accounts for a maximum navigation probability (MNP) of said cacheline, and wherein said MNP is defined as a maximum probability from a plurality of probabilities that a user will request said content element from a content element stored in one or more other cachelines, and wherein said plurality of probabilities are determined using a quantity of predecessors for said other cachelines;

Claims 11 and 40 are each amended to recite similar language.

The above language can be understood, at least in one embodiment, in conjunction with page 37, line 15 through page 38, line7 of Applicant's specification. Applicants submit that the disclosed approach for computing a navigation probability data field is novel and nonobvious.

Neither Horvitz, Treynor, nor the other references of record teach computing a maximum navigation probability (MNP) that is "defined as a maximum probability from a plurality of probabilities that a user will request said content element from a content element stored in one or more other cachelines," as recited. Furthermore, Applicants claims recite that "said plurality of probabilities are determined using a quantity of predecessors for said other cachelines," which is also not taught nor suggested by the cited references.

Horvitz discloses at col. 41, lines 1-4 that "these probabilities can be determined through a hand-crafted Bayesian network using data from appropriately instrumented browsers..." but does not teach or suggest the claimed approach. Treynor and the other references of record also fail to cure the deficiency of Horvitz.

Neither Horvitz nor Treynor disclose "said plurality of probabilities are determined using a quantity of predecessors for said other cachelines" as recited in Applicants' claims. Horvitz Fig. 8 was cited as teaching a similar, previously recited aspect of the claims, allegedly because Horvitz determines a set of URLs that may be accessed next (Horvitz 810), and that this would inherently account for having at least one predecessor. Official Action p. 3. However, even assuming *arguendo* that this statement from the Official Action is correct, Applicants observe that the one "predecessor" in Horvitz Fig. 8 is not used in computing a navigation probability field. Horvitz uses the "predecessor" to identify a URL, but the fact that there is one "predecessor" is not used in determining a navigation probability data field for navigating to such URL. Thus Horvitz does not teach or suggest "said plurality of probabilities are determined using a quantity of predecessors for said other cachelines" as stated in Applicants claims, nor does Horvitz teach or suggest using information regarding whether a cacheline has zero, one, or multiple predecessors to compute a navigation probability, as previously recited. Applicants thus reserve the right to pursue the subject matter of the claims prior to this amendment in one or more continuation applications.

Because the remaining claims depend either directly or indirectly from independent claims 11, 32, and 40, they are considered allowable for the same reasons. Applicants respectfully request reconsideration and allowance of the application.

Date: November 28, 2007   /Nathaniel Gilder/
                                                      Nathaniel Gilder
                                                        Registration No. 53,233

Woodcock Washburn LLP
Cira Centre
2929 Arch Street, 12th Floor
Philadelphia, PA 19104-2891
Telephone: (215) 568-3100
Facsimile: (215) 568-3439